

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	<b><u>REQUEST TO ENTER</u></b>
	:	<b><u>DEFAULT</u></b>
DEUTSCHE BANK, A.G.; DB U.S. FINANCIAL	:	
MARKETS HOLDING CORP.; DEUTSCHE	:	
BANK SECURITIES, INC.; BMY ACQUISITION	:	ECF CASE
CORP.; BMY ACQUISITION LLC; BMY	:	
STATUTORY TRUST; and FIRST UNION	:	14 Civ. 9669 (LAK)
NATIONAL BANK, n/k/a WELLS FARGO BANK	:	
N.A., as trustee of BMY STATUTORY TRUST,	:	
	:	
Defendants.	:	
	:	
-----X	:	

Plaintiff United States of America hereby respectfully requests that the Clerk of the Court enter default in this matter against defendant BMY Acquisition Corp. (“BMY Corp.”), on the ground that BMY Corp. has failed to respond to the Complaint within the time prescribed by Rule 12 of the Federal Rules of Civil Procedure. Plaintiff properly served BMY Corp. by serving its registered agent listed on a website maintained by the Secretary of State of the State of Delaware on January 23, 2015, serving its registered office designated in the files of the Delaware Secretary of State on January 23, 2015, and serving the Delaware Secretary of State on February 6, 2015, as indicated by the certificate of service and affidavits attached thereto on file with this Court.

Attached hereto as Exhibit 1 is a proposed Clerk's Certificate of Default to be entered,  
noting the default.

Dated: New York, New York  
April 1, 2015

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
Attorney for the United States of America

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